

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

V.

JOSHUA MAST, *et al.*,

Defendants,

Case No. 3:22-cv-49-NKM

**DEFENDANTS JOSHUA AND STEPHANIE MAST’S MOTION TO SEAL
THEIR PRE-HEARING BRIEF IN OPPOSITION TO PLAINTIFFS’
MOTION TO SHOW CAUSE AND FOR SANCTIONS**

Defendants Joshua and Stephanie Mast (the “Masts”), by and through their undersigned counsel, hereby move the Court to seal their Pre-Hearing Brief in Opposition to Plaintiffs’ Motion to Show Cause and for Sanctions (ECF No. 414) and Exhibits B, C, and E attached thereto because those documents contain confidential information, and the Masts believe sealing is the best way to comply with the Court’s protective order (ECF No. 26)¹ and the orders in the Fluvanna County Circuit Court proceeding.

Dated: May 22, 2024

Respectfully submitted,

/s/ John S. Moran

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¹ The Masts maintain, however, that this protective order should be modified or lifted because it does not comply with the First Amendment. *See* ECF No. 130.

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